

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

PERSONAL AUDIO, LLC

§

§

v.

§

Case No. 2:13-CV-270-JRG-RSP

§

CBS CORPORATION

§

PLAINTIFF'S ANSWER TO DEFENDANT CBS CORPORATION'S COUNTERCLAIMS

Plaintiff Personal Audio, LLC ("Plaintiff") submits this answer to Defendant CBS Corporation's Counterclaims per Fed. R. Civ. P. 12.

ANSWER

1. Admitted.
2. Admitted.
3. Admitted.
4. On information and belief, Plaintiff admits the allegations of Paragraph 4.
5. Plaintiff admits it is a Texas limited liability company. Plaintiff denies all other allegations of Paragraph 5.
6. Admitted.
7. To the extent Paragraph 7 contains any allegations, Plaintiff denies them.
8. Admitted.
9. Denied.
10. Denied.
11. To the extent Paragraph 11 contains any allegations, Plaintiff denies them.

- 12. Admitted.
- 13. Denied.
- 14. Denied.

RESPONSE TO PRAYER FOR RELIEF

Plaintiff denies that Defendant is entitled to any of the relief sought in its prayer.

Respectfully Submitted,

Dated: April 21, 2014

/s/ Papool S. Chaudhari

By: _____

Jeremy S. Pitcock
PITCOCK LAW GROUP
1501 Broadway, 12th Floor
New York, NY 10036
(646) 571-2237
(646) 571-2001 Fax
jpitcock@pitcocklawgroup.com

T. John Ward
State Bar No. 20848000
T. John Ward, Jr.
State Bar No. 00794818
Claire A. Henry
State Bar No. 24053063
WARD & SMITH LAW FIRM
P.O. Box 1231
Longview, Texas 75606-1231
(903) 757-6400 (telephone)
(903) 757-2323 (facsimile)
E-mail: tjw@wsfirm.com
E-mail: jw@wsfirm.com
E-mail: claire@wsfirm.com

Papool S. Chaudhari
Texas State Bar No. 24076978
CHAUDHARI LAW, PLLC
P.O. Box 1863
Wylie, Texas 75098
Phone: (214) 702-1150
Fax: (214) 705-3775
Papool@ChaudhariLaw.com

BURNS & LEVINSON LLP
Howard J. Susser (pro hac vice)
hsusser@burnslev.com
Stephen Y. Chow (pro hac vice)
schow@burnslev.com
Merton E. Thompson, IV (pro hac vice)
mthompson@burnslev.com
Zachary R. Gates (pro hac vice)
zgates@burnslev.com
125 Summer Street
Boston, MA 02110
Telephone: 617-345-3000
Facsimile: 617-345-3299

**ATTORNEYS FOR PLAINTIFF
PERSONAL AUDIO, LLC**

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a). As such, the foregoing was served on all counsel of record who have consented to electronic service. Local Rule CV-5. Pursuant to Fed. R. Civ. P. 5(d) and Local Rule CV-5, all others not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing via email on this 21st day of April, 2014.

/s/ Papool S. Chaudhari

Papool S. Chaudhari